

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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|--------------------------------|---|-------------------------------|
| MOHAMMED OZRAIL | : | CIVIL ACTION NO. 2:21-cv-3443 |
| | : | |
| v | : | |
| | : | |
| JOSE MARTINEZ-COLON, | : | |
| MILLER DEDICATED SERVICES, LLC | : | |
| MILLER AUTO LEASING CO., and | : | |
| SEASHORE FRUIT AND PRODUCE CO. | : | |

NOTICE OF REMOVAL

The defendants hereby remove this matter from the Court of Common Pleas of Philadelphia County, to the United States District Court for the Eastern District of Pennsylvania, pursuant to 28 USC Section 1332, and aver in support of the removal as follows:

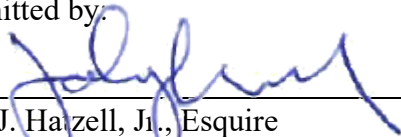
1. Attached hereto as Exhibit 1 is the complaint filed in the Court of Common Pleas of Philadelphia County on June 28, 2021.
2. Plaintiff is identified as Mohammed Ozrail and he resides at 9752 Hilspach Street, Floor 2, Philadelphia, PA 19115.
3. Defendant, Jose Martinez-Colon is an individual who resides at 44 West Montrose Street, Vineland, NJ, and he was served with the complaint on July 12, 2021.
4. Defendant, Seashore Fruit and Produce Co., is a New Jersey corporation located at 1344 NW Boulevard, Vineland, NJ, and it was served with the complaint on July 12, 2012.
5. Defendant, Miller Dedicated Services, LLC is a Delaware Limited Liability Company consisting of three (3) members who are citizens of the State of New Jersey. The company was served with the complaint on July 16, 2021.
6. Miller Auto Leasing is a New Jersey corporation with principal place of business located at 1824 Route 38, Lumberton, NJ 08048.

7. The incident that is the subject of the complaint occurred in Philadelphia, PA at One East Penn Square.

8. The amount in controversy is more than seventy-five thousand dollars (\$75,000).

9. The Court has jurisdiction to hear this case pursuant to 28 USC Section 1332.

Submitted by:



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CERTIFICATE OF SERVICE

I, John J. Hatzell, Jr., Esquire, hereby certify that a true and correct copy of the Notice of Removal was served on the following individual by the Court's EFS and/or regular US mail, postage pre-paid:

*Feeda R. Musitief, Esquire
THE MUSITIEF FIRM
1333 Race Street
Philadelphia, PA 19107*

HADDIX AND ASSOCIATES

By: _____


JOHN J. HATZELL, JR., ESQUIRE

Dated: August 3, 2021